

ON-SCENE COORDINATOR'S REPORT

CERCLA IMMEDIATE REMOVAL PROJECT

ELECTRIC UTILITIES COMPANY

LASALLE COUNTY, ILLINOIS

CONTRACT #68-95-0017

CHARLES CASTLE, ON-SCENE COORDINATOR

EPA Region 5 Records Ctr.



227346

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1.0 SUMMARY OF EVENTS

1.1 Location

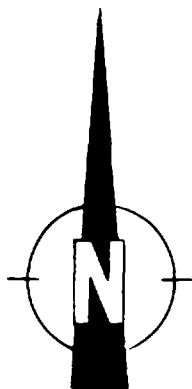
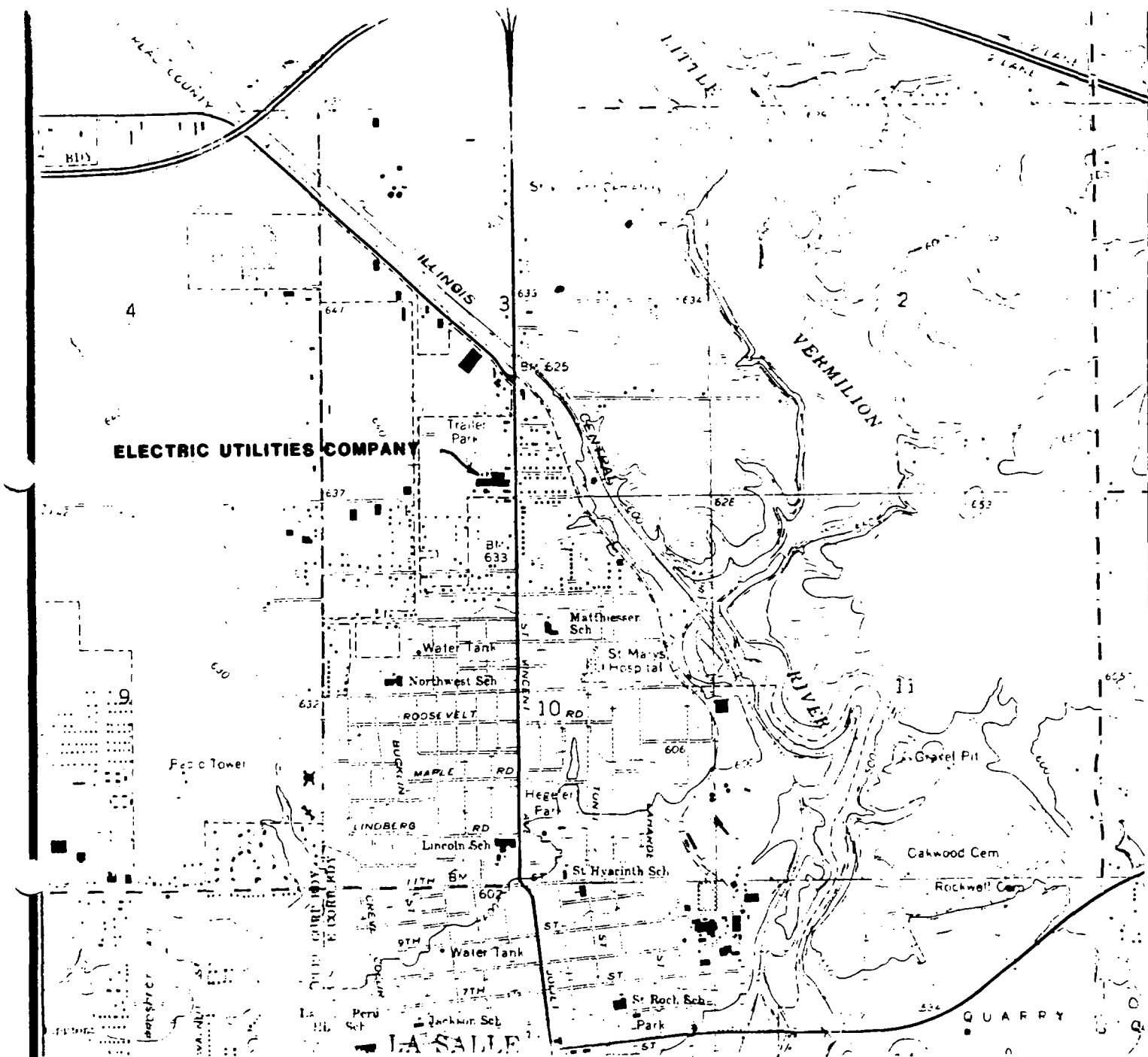
The Electric Utilities Company (EUC) is located at 2427 St. Vincents Avenue, in the SE 1/4 of the SW 1/4 of Section 3, T33N, R1E, LaSalle County, Illinois (Figure 1). This former PCB capacitor manufacturing plant covers approximately ten acres and is bounded on the north by agricultural land, on the west by a fallow field, on the south by businesses, and on the east by St. Vincents Avenue and a residential area.

The site is located within the Little Vermillion River drainage basin. The river flows in a southerly direction about one mile east of the site. An intermittent stream runs about one-quarter mile east of the site and flows southeast to its confluence with the Little Vermillion River. The Illinois River is joined by the Little Vermillion River about two miles south of the site. The site is located on the north side of LaSalle with a surrounding population of approximately 200 residents.

1.2 Site Description

Electric Utilities started operations in December 1939 and began using polychlorinated biphenyls (PCBs) in the manufacturing of capacitors in the late 1940s. EUC sprayed PCB-contaminated oils for dust control on the site until 1969. EUC ceased using PCBs altogether in the manufacturing of capacitors in the fall of 1978. In 1980, EUC closed down manufacturing operations in its LaSalle plant and moved the balance of its operations to its Farmville, North Carolina, facility. The LaSalle plant has been vacant since its closing in 1980.

The site consists primarily of a large manufacturing and office building (Figure 2). Numerous storage sheds are located throughout the site, the majority of which are abandoned except for one where 144 55-gallon drums of PCB waste material is stored. An abandoned tanker and drum storage area are located on the west part of the site. The storage contains approximately 150 full and empty drums. The facility is enclosed by an 8' high chain-link fence that was constructed during the previous immediate action of July and August of 1983. Access to the facility is through either a 20' gate or 12' gate off St. Vincents Avenue. Both gates are currently kept locked. In the southwest corner of the property, vandals have dismantled the corner of the fence to gain access to the site.



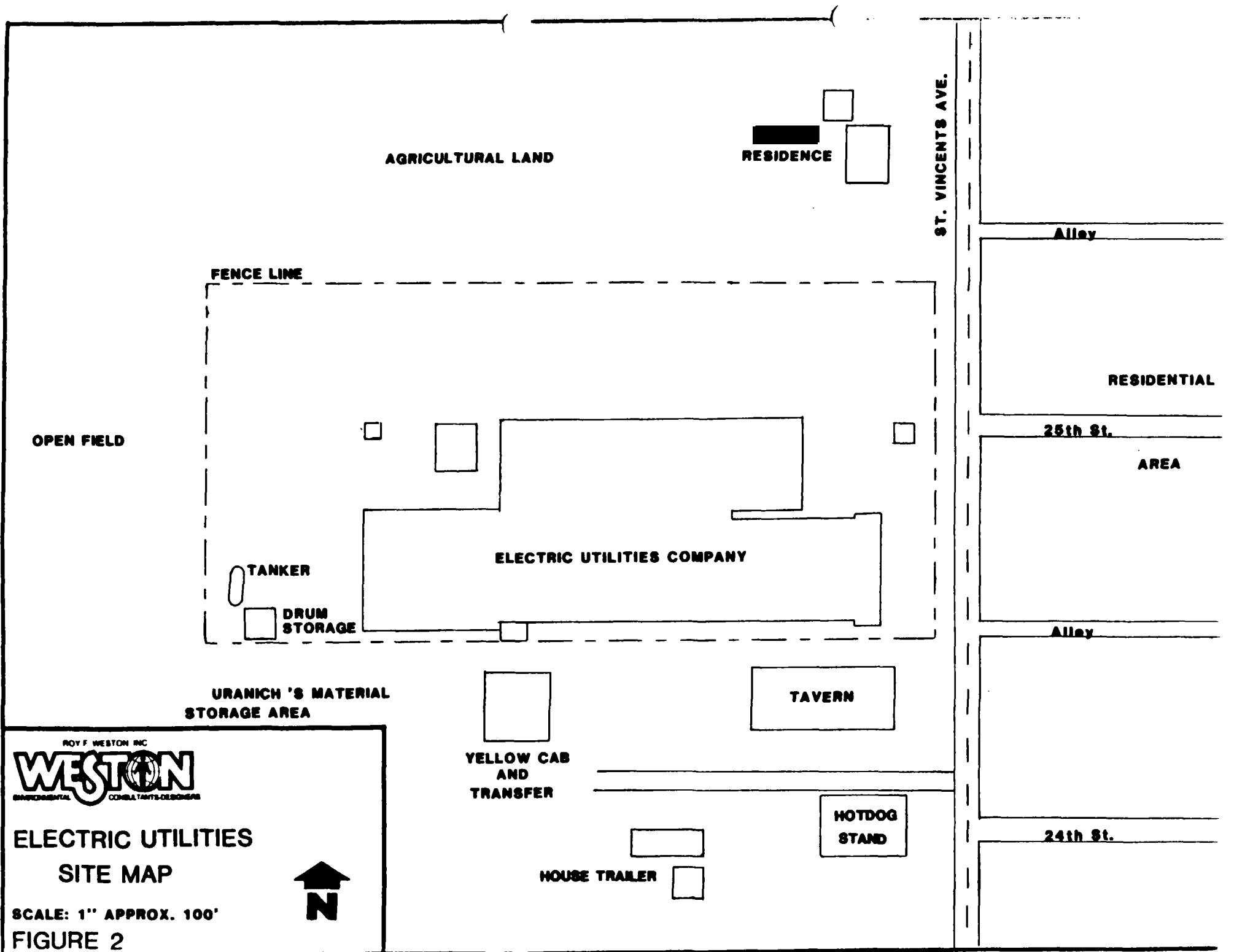
ROY F WESTON INC
WESTON
 ENVIRONMENTAL CONSULTANTS-DESIGNERS

ELECTRIC UTILITIES COMPANY SITE LOCATION

SCALE: 1 INCH APPROX. 2000 FEET

FIGURE 1

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**ELECTRIC UTILITIES
SITE MAP**

SCALE: 1" APPROX. 100'

FIGURE 2



Areas of concern in this immediate action are Yellow Cab and Transfer property owned by Mr. Larry Uranich and the area directly west of the site.

Mr. Uranich operates a service station with a small grocery store in the front. The remainder of the building is used for an office for his other hauling and construction business. The area to the east of the office building is used primarily for parking, although it does contain a small picnic area (Figure 3). Located immediately to the west of the building is a salvage yard or storage area for many of Mr. Uranich's pieces of heavy equipment, tank trucks, and construction debris that has accumulated over several decades. West of the storage area are several storage sheds, a horse stable, and a corral. Directly south of the office building is an alfalfa field owned by Mr. Uranich. The fallow field located west of the fenced facility is owned by EUC. This area is overgrown with weedy vegetation and a few saplings.

1.3 Initial Situation

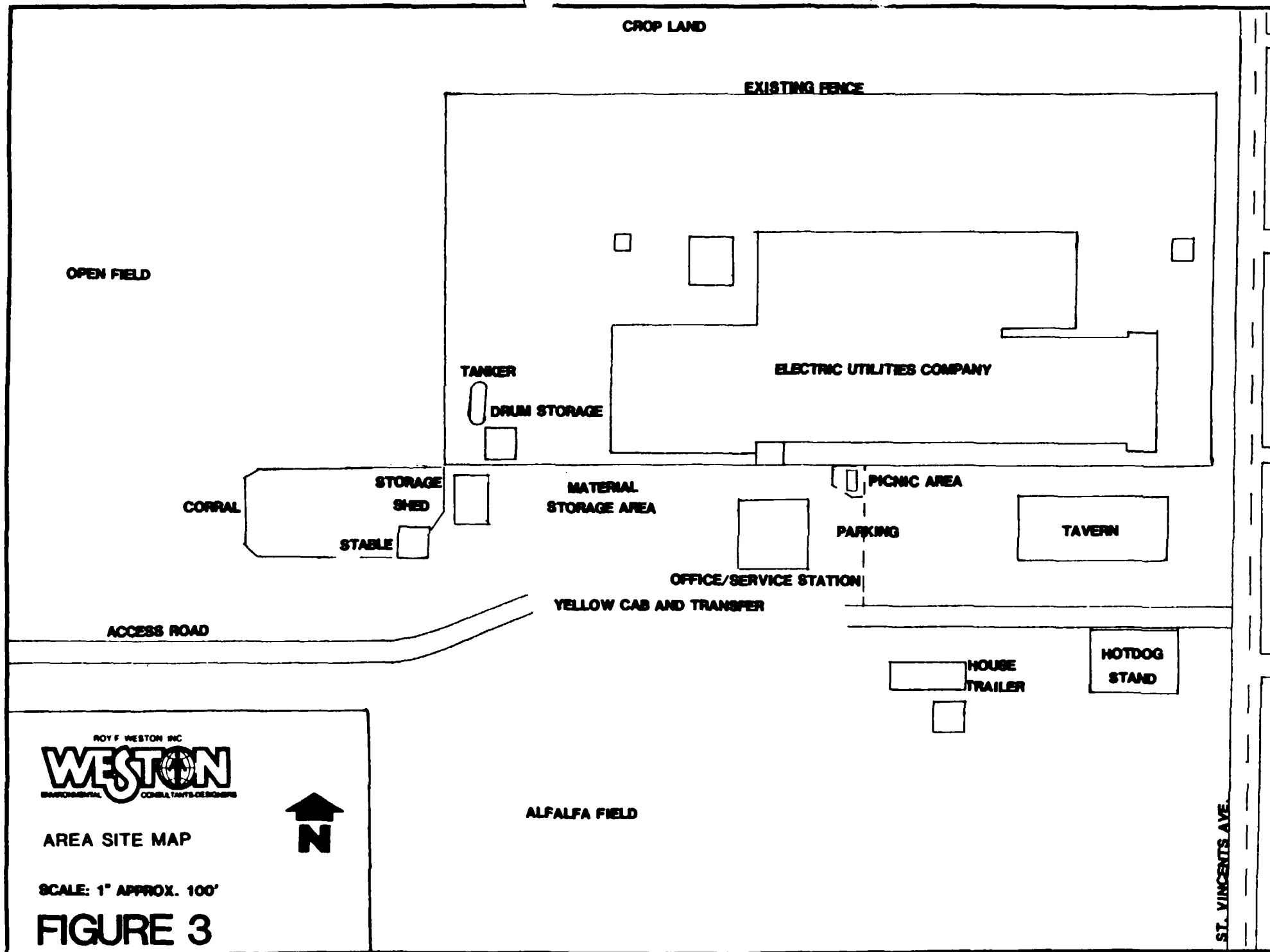
On October 22, 1979, EUC was inspected by the Occupational Safety and Health Administration (OSHA) and the U.S. Environmental Protection Agency (U.S. EPA) in response to complaints from union members of poor and hazardous working conditions. This inspection found the following violations:

1. Sludge in the final manhole, into which all facility sewer lines drain, contained 800 parts per million (ppm) PCBs.
2. Improper long-term storage of 141 drums of contaminated sludge, capacitors and miscellaneous solids.
3. Improper long-term storage of 20 drums and a tanker vehicle of liquid PCBs.
4. Improper labeling and marking of the above drums and tank.

The U.S. EPA proposed penalties of \$55,000 for the above-cited violations in a Complaint and Notice of Opportunity for Hearing. The settlement is currently under Jurisdiction of the Administrative Law Judge.

On December 11, 1980, the Illinois Environmental Protection Agency (IEPA) received a complaint that EUC's PCB waste oils were being dumped near the plant. Representatives of the

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IEPA investigated the complaint on December 12, 1980, and found no evidence of large-scale illegal dumping; however, some areas of oil spillage were observed. Three soil samples were obtained from the stained locations; the results revealed concentrations ranging from 5,300 ppm to 113,000 ppm.

After receiving the results of the December 12, 1980, samples, the IEPA conducted a more extensive sampling program on February 25, 1981. These results documented off-site contamination of 18 ppm on adjacent property. One sample result revealed 160,000 ppm at a point on the south side of the plant.

The Circuit Court of the Tenth Judicial Circuit of Illinois, LaSalle County, ordered EUC to construct a three strand barbed wire fence around the perimeter of the property. Three signs were also placed around the perimeter of the site with four inch letter stating: "DANGER, HAZARDOUS SUBSTANCES, NO ADMITTANCE WITHOUT PERMISSION, BY COURT ORDER." The fence was to be completed by June 9, 1981.

In the summer of 1981, the IEPA took additional soil samples on and off site and found additional PCB contamination. Contamination of over 50 ppm was prevalent around most of the site with three areas having relatively high concentrations: 5,800 ppm around the tanker, 113,000 ppm south of the plant building; and, 11,000 ppm at the northeast corner of the property. Off-site concentrations were generally less. Samples taken from the open area west of the site revealed no PCB concentrations greater than 1 ppm. Concentrations in the agricultural field north of the site were less than 50 ppm except along the eastern side of the property near the [REDACTED] residence where concentrations reached as high as 480 ppm. Soil samples taken from the east side of St. Vincents Avenue ranged from 18 to 220 ppm. Samples south of the site, on the property of the Yellow Cab and Transfer, had PCB concentrations as high as 2,100 ppm.

In August of 1982, the Field Investigation Team (FIT) installed four ground water monitoring wells. One of the four wells indicated PCB contamination of 147 parts per billion (ppb). According to the FIT report, this result was suspect because PCBs are strongly attenuated by soils and have a very low solubility in water; therefore, ground water in this area may have been contaminated during installation.

Based on data provided by the FIT and the IEPA, the U.S. EPA submitted the EUC site for inclusion on the National Priority List with a score of 33.3 using the Hazard Ranking System. The site was subsequently placed on the National Priority List at (Number 383).

In July of 1983, the U.S. EPA conducted an Emergency Action to secure the site and prevent the migration of PCBs from highly contaminated areas. The U.S. EPA constructed an 8' high chain-link fence around the perimeter of the EUC site. The U.S. EPA capped a 100' x 6' section of highly contaminated area located along the south boundary line on property owned by Mr. Uranich. These two actions helped to eliminate the threats of human contact and the spreading of PCBs until an extent-of-contamination study could be conducted.

In the fall of 1983, TAT was tasked to conduct an extent-of-contamination study. The results documented off-site contamination in both the residential area to the east, Yellow Cab and Transfer property to the south, and in the field west of the fenced area (Figure 4).

The study indicated that the major area of concern was the area south of the EUC property where Mr. Uranich stored material from his business. This area was well traveled by both trucks and passenger vehicles as well as local residents on foot. The U.S. EPA's concern was that PCBs were migrating off site and possibly impacting the workers and local residents who traveled through this area.

A request for a continuation of removal activities at EUC was filed in May of 1984. An exemption to Section 104(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) was required to extend the six month time limit on emergency actions so capping and fencing operations could be implemented.

After receiving approval, \$40,000 was allocated for the action (Appendix A).

The initial strategy for the Immediate Action consisted of extending the fence to the west to enclose the highly contaminated area; move and decontaminate construction material and vehicles prior to paving and capping; and apply asphalt south of EUC property to cover those areas on the Yellow Cab and Transfer property with PCB concentrations in excess of 50 ppm.

The project was originally scheduled for start-up on May 23, 1984, but was delayed until an agreement could be reached between the U.S. EPA and Mr. Uranich concerning the area to be paved. Mr. Uranich demanded that the paved area include all areas previously agreed upon in a letter from OSC Ron Lillich (Appendix Y), instead of areas with concentrations of 50 ppm or greater as proposed by the new OSC, Charles Castle. The paving of areas of 50 ppm or greater was based

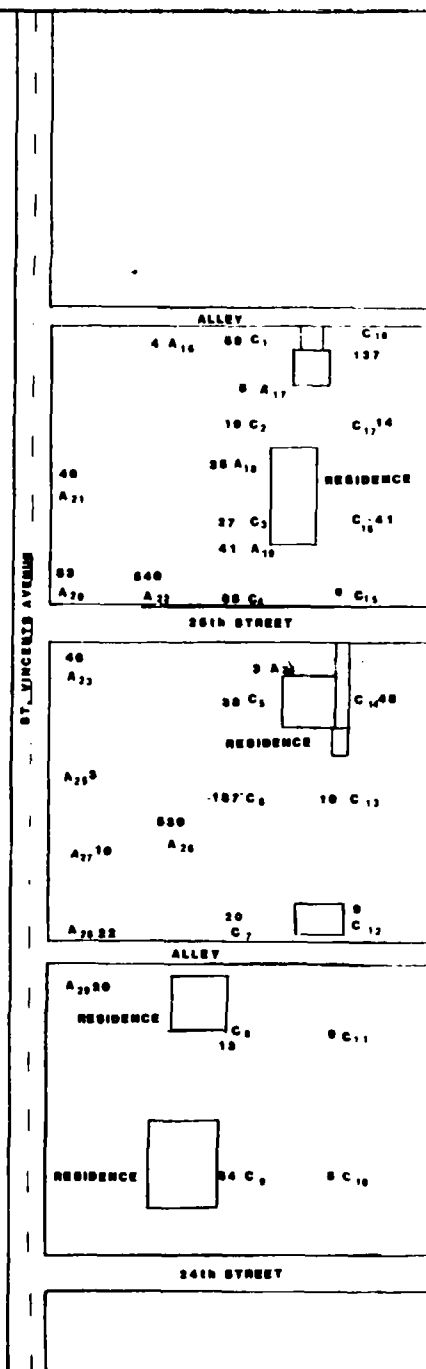


FIGURE 4

on consultation with the Office of Regional Counsel and Center for Disease Control.

After consultation between Mr. Uranich's lawyers and the U.S. EPA, it was agreed that the area to be paved would consist of the area outlined in Mr. Lillich's letter (Figure 5).

1.4 Federal Cleanup Action

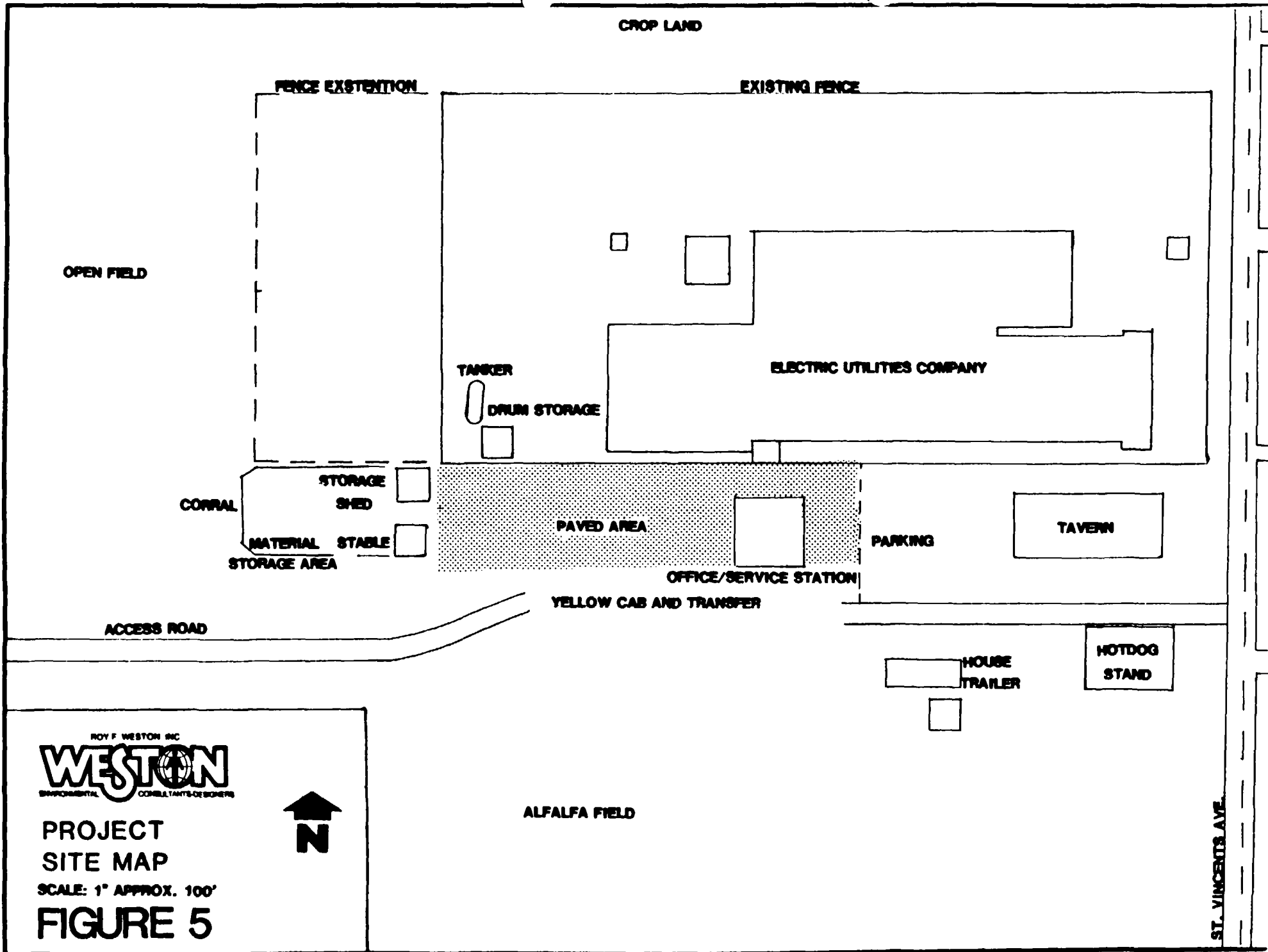
The federal cleanup action at EUC began on June 5, 1984. The ERCS subcontractor for the cleanup was Oil and Hazardous Materials (OHM) of Findlay, Ohio. The statement of work stated the contractor shall install an asphalt cap over soil contaminated with PCBs in accordance with instructions by the OSC, extend the chain-link fence as directed by the OSC, and decontaminate all equipment prior to leaving the site. Decontamination water shall be filtered by carbon filtration before discharge.

A pre-action meeting was held between U.S. EPA OSC Charles Castle and OHM Response Manager Al Blanchard to discuss site safety, decontamination procedures, and the overall cleanup approach. After an initial site assessment by the OSC and Response Manager, it was determined that the level of protection would be Level D in areas not contaminated, and Level C during decontamination of Uranich's equipment. Two rubber-tired front-end loaders would be needed to move the majority of material. OHM recommended washing the material where it was positioned, using a low-volume sprayer with penatone solution. This would eliminate the need for treating the decon water by carbon filtration.

The ERCS program manager, John Bruck, informed the OSC that both the paving and fencing contractors would be on site on the following day (June 6, 1984) to get specifications for the asphalt cap and fence extension.

On June 6, 1984, the fence and paving contractors were on site. The two fence contractors were Schwanke Ind. and Northern Illinois Fence. The existing fence was to be extended 150' further west on the north and south side with the existing west portion being reused. The fence was to be 8' in height with all posts driven 42" into undisturbed soil. The fence contract was awarded to Schwanke Ind. who submitted a bid for labor and materials of \$3,489.00.

Paving contractors on site to get project specifications were Central Illinois Contracting Corp.; C&D Excavating and Asphalt Paving, Inc.; and, Universal Contracting Corporation. The specifications called for laying a nonwoven geotextile



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PROJECT
SITE MAP

SCALE: 1" APPROX. 100'

FIGURE 5

fabric and then applying two 1 1/2" lifts of asphalt for a total of 3" over an area of approximately 3,000 square yards. The contract was then awarded to Universal Contracting Corporation who submitted a bid of \$51,800.

OHM arrived on site, set up an office trailer, and began mobilizing equipment. Power to the office trailer was supplied by a 5 KW diesel generator. OHM continued to set up the office trailer and began moving Uranich's equipment to the west portion of Uranich's property under the direction of Kevin Uranich, Mr. Larry Uranich's son. OHM continued to move equipment from the uncontaminated area in Level D protection for the remainder of the day.

During Thursday, June 7, 1984, the fencing contractor arrived on site with his supplies. The OSC informed the fence contractor to start disassembling the west portion of the fence. OHM began the day by disassembling part of Uranich's corral fence so that the grade could be cut for the new fence extension. Mr. Uranich agreed to let OHM remove the fence under the condition that they replace the existing electrical fence that surrounds the corral. After cutting the grade for the north and west sections of the fence, OHM needed to obtain permission from the [REDACTED] owners on the north side, to cut down several trees that ran along the north property line before the grade could be cut. U.S. EPA then contacted Mr. [REDACTED] who gave permission to remove the trees that were in the way.

The local news reporter, Dave Piccioli from the News Tribune, arrived on site. He conducted an interview with OSC Castle concerning the Federal Immediate Cleanup in progress. The reporter also took a few pictures. Mr. Uranich voiced concern to the OSC that the pictures and story might make him lose business.

Before actual construction of the fence could begin, the U.S. EPA obtained a variance permit from the City of LaSalle that has building codes barring construction of 8' fences. The City of LaSalle issued the permit and variance without delay.

OHM continued to move Uranich's material for the remainder of the day. By the end of June 7, 1984, all fence posts were set on the south property line.

The following day, June 8, 1984, OHM began removing contaminated material from the area that was to be paved. The workers upgraded the level of protection to Level C. Decontamination consisted of first removing any soil from the objects to be moved. Once soil was removed, the material was washed with a penatone solution to remove any residual PCBs. After decontamination, the equipment was transported to the west side

of Uranich's property. To prevent the front-end loaders from becoming contaminated during this procedure, the contaminated areas where the loaders were running were covered with visqueen.

Mr. [REDACTED] came on site to inquire about the possibility of contamination in his vegetable garden. OSC Castle informed him that PCBs adhere to soil particles and that if produce from his garden was washed thoroughly, it would be safe for consumption. This was only a precautionary measure since contamination in Mr. [REDACTED] garden was minimal, if at all.

Over the weekend of June 9, the phone company was on site to hook up the office phone.

Work continued on Monday, June 11, 1984. Most of the small material was moved by the end of this day. Mr. Uranich also informed OHM they could disassemble the storage sheds. The following morning, OHM began dismantling the storage shed. One of the Uranich's box trailers was damaged during removal operations and had to be replaced with a \$600, 40 ft box trailer. This was purchased from the Cookie Kingdom, a local business.

On Wednesday, June 13, 1984, all material on the area to be paved had been moved and decontaminated. OSC contacted PEDCO Environmental, Inc., to have the paving contractors on site tomorrow. OHM demobilized everything but the office trailer, port-a-john, and generator. The response manager was going to remain on site to oversee paving operations.

The paving contractor arrived on site at 1000. A meeting was held between OSC, Mr. Uranich, and the contractor. The contractor wanted to inform both the OSC and Mr. Uranich about his approach to the paving and the design involved in drainage control. His plans called for cutting a drainage ditch to divert the water away from Uranich's office. The ditch would run along the EUC south property line and empty onto EUC property. To facilitate the grading operations, a 40 ft section of fence had to be taken down temporarily so a front-end loader and grader could dispose of excavated soil on EUC property. The fencing operations would be done by Schwanke Ind. for an additional \$925. After the meeting, all parties were in agreement with the scope and plans of the paving phase.

On Friday, the 15th, the contractor finished the rough grading of the area. Rainy weather and muddy conditions slowed the operations and final grading was completed on Monday, June 18. The paving equipment was then decontaminated using the pena-tone wash.

Later on the 18th, the geotextile fabric, SUPAC, from Phillips Petroleum, was delivered to the site. The SUPAC was being used as a base for paving. This would help stabilize the asphalt and eliminate any movement of PCB. The SUPAC was secured to the surface with 6" spikes driven in the ground at 5 ft intervals and every 2 1/2 ft on the edges. Joints were overlapped by 2 ft. All paving personnel were supplied with Level C protection and by Wednesday, June 20, 1984, the SUPAC was laid.

On Thursday, June 21, the contractor laid the first 1 1/2" lift of asphalt. In areas where the paver could not get to, the contractor hand-laid a single 3" lift.

The fence contractor finished replacing the extra 40' of fence using a 10' fence fabric to prevent people from crawling under the fence through the ditch.

During the early morning hours of Friday, June 22, the LaSalle area was hit with a major storm event that produced 2.25" of rain within an hour. Upon arriving at the site, the Yellow Cab and Transfer office was surrounded by water on three sides and the drainage ditch was completely full. The U.S. EPA acted quickly and ordered the paving contractor to construct a drainage basin approximately 35' square and 5' deep. When this was completed, the contractor broke away the temporary dam which proceeded to drain the water out of the ditch. After careful observation, it was noted that a majority of the EUC roof run-off drained onto Uranich's property. To prevent future events of this nature, the EUC gutter system was rerouted to drain onto EUC property, thus eliminating any more potential for flooding. Due to the massive amount of standing water, the paving contractor informed U.S. EPA that the final lift (1 1/2") could not be laid until the area dried out. This pushed the project completion back one week.

OHM was tasked to demobilize the remainder of the equipment and to seed the area around the retention basin on EUC. OHM used a seed combination of 95% annual rye grass and 5% perennial rye grass to control future dust problems.

On June 28, 1984, the paving contractor finished laying the final 1 1/2" of asphalt on Uranich's property. The contractor advised U.S. EPA to allow the asphalt to set properly before replacing some of Uranich's equipment. After the asphalt had sufficient time to set, OHM returned to the site to replace Uranich's tanks, rocks, parking bumpers, and electrical fence.

In September 1984, the U.S. EPA was notified by Mr. Uranich that since the parking lot was installed, the office building had flooded several times during heavy rains. On September 19, 1984, TAT member Loch and OSC Castle visited the site to evaluate the situation and to determine what corrective actions could be taken. It was determined that water was entering the east side of the building through the base of the door and along the southeast corner of the building. Also rain water was still running off the roof of the E.U.C. building, causing water to back up on the parking lot after a heavy rain.

On October 19, 1984, Universal Contracting Corp., was directed by OSC Castle to correct the flooding problem by:

- o Installing an asphalt curb next to the east door and southeast corner of the building;
- o Sealing the asphalt with an asphalt sealer in the immediate vicinity of the building; and,
- o Diverting the E.U.C. roof run-off to E.U.C. property.

The federal cleanup action was completed on October 19, 1984, after the corrective actions were implemented.

1.5 State and Local Government Participation

The state's initial involvement dates back to December 11, 1980, when they received a complaint concerning the dumping of PCB oils. The state then inspected and sampled the site several times. These sample results documented both on- and off-site contamination. The state, with its sampling and site observations, was instrumental in getting EUC ranked on the National Priority List.

During the course of this action, the state conducted an extent-of-contamination study taking soil borings down to 4 feet around the perimeter of the EUC site. Infrared photography performed by the state around the EUC site helped to locate areas of high PCB contamination. This study is to be used for the remedial cleanup action which is scheduled to start in 1985. Due to the lack of funding at the time of this immediate action, the state was unable to conduct this immediate action.

Local government agencies cooperated with federal officials and helped expedite a fence permit that required a variance

from local building codes due to the fence's height of 8 feet. The Mayor of LaSalle, Quinto Pattelle, made a special trip out to the site to sign the variance so construction could begin.

1.6 Summary of Expenditures

O.H. Materials, Inc., of Findlay, Ohio, was the prime subcontractor under the Emergency Response Cleanup Service Contract (ERCS). The following presents a breakdown of costs incurred July 2, 1984, under the contract for this Immediate Action through July 2, 1984.

O.H. Materials, Inc.

Labor	\$21,008.60
Equipment	13,049.70
Materials	1,638.16
Subtotal	\$35,696.46

Subcontractors

Schwanke Ind.	\$ 4,519.67
Illinois Bell	300.00
J & L Gas	43.68
Universal Contracting	53,135.00
Patten Tractor & Equip. Co.	200.00
Joe Claudnic & Sons	68.25
Subtotal	\$58,266.60

U.S. EPA and TAT Costs

U.S. EPA personnel, labor	not available
U.S. EPA personnel, travel	\$837.00
U.S. EPA vehicle	350.00
TAT (estimated through March 1, 1983)	8,000.00
Subtotal	\$9,187.00

Estimated Total Project Cost \$103,150.06

1.7 Public Health and Community Relations

Since the previous cleanup action of EUC in August 1983, an extensive community relations plan was developed by U.S. EPA Division of Public Affairs (Appendix U). Prior to the cleanup, the following community relations activities were completed: community impact assessment; mailing list; interviews with local officials, adjacent property owners, and other interested groups; and a public meeting to discuss the cleanup process.

The public meeting was held in February 1984 and was attended by Vanessa Musgrave, U.S. EPA Public Affairs, Ronny Lillich, then acting OSC, U.S. EPA; and Greg Michaud, IEPA. Discussed at the meeting were the plans for the pending Emergency Action and local health effects.

Once the cleanup was underway, David Piccioli, News Tribune, was on site several times to get updates and progress reports. Pictures and an article concerning the cleanup were published in the local paper (Appendix V).

2.0 EFFECTIVENESS OF IMMEDIATE ACTION

2.1 Responsible Party

The only party named in this action was Electric Utilities Company of LaSalle. As mentioned in Section 1.2, EUC was ordered by the court in 1983 to construct a three-strand barbed wire fence and post warning signs around the site. After receiving a notice letter for the first action in August 1983, company representatives submitted a site cleanup proposal to the U.S. EPA. This proposal was never undertaken and in October of 1983, EUC filed for bankruptcy.

2.2 State and Local Agencies

At the time of the cleanup, IEPA was on site conducting an extent-of-contamination study. The state collected soil borings down to 4' around the perimeter of the site. The samples will be analyzed with a detection limit set at 1 ppm. This sampling program should be completed by the end of August 1984. The state also flew infrared photography over the vicinity of EUC to help detect locations of high concentrations of PCBs. Results of both these studies have not been published. A final report will be developed to document off-site contamination. This state report should be out in the spring of 1985.

Prior to this action, the state conducted several other sampling programs that documented both on-site and off-site contamination. IEPA was able to gather enough data to have EUC construct a temporary fence. This data, along with field observations by IEPA, helped put the site on the NPL.

Due to a local ordinance, the City of LaSalle does not allow fences above 6' in height. Therefore, a variance had to be obtained for the extension of the 8' fence. At the time of application for the permit, the Mayor of LaSalle, Quinto Pattelle, was not in the office to approve the permit. The mayor then made a special trip out to the site to sign the permit. This helped to expedite the beginning of the fence extension and eliminated any delays.

2.3 Federal Agencies

Objectives of this Immediate Action were to mitigate the imminent threats to human health and the environment existing at the site. The first step to minimize the threat presented by human contact was to extend the existing fence 150' to the west. This extension enclosed the highly contaminated soil that was found in the extent-of-contamination study. The fence was extended to a point where results were found to be less than the detection limit of 5 ppm.

The other area addressed in this action was Mr. Uranich's property located along the southern boundary of the EUC property. By providing an asphalt cap and curb, migration of PCB with surface run-off was stopped. In addition, because of the closeness of EUC and the level of vehicular traffic on Uranich's property, the cap eliminated the potential threats for direct human contact posed by PCB-contaminated dirt and dust. Since much of Mr. Uranich's equipment needed to be decontaminated, this allowed Mr. Uranich to again use all his equipment that had previously been out of operation because of PCB contamination.

On June 28, 1984, the federal action ended with the replacement of tanks and other material onto the newly paved parking lot on Mr. Uranich's property.

2.4 Contractors

The ERCS prime subcontractor for the project was OHM. For the duration of the cleanup, the contractor performed in as efficient a manner as possible in spite of constant threat of legal action from Mr. Uranich. In the earlier cleanup action, Mr. Uranich had filed a law suit against OHM for alleged damage to his personal property. As a result, OHM exercised extreme caution when moving any of Uranich's material, no matter how trivial. OHM Response Manager, Al Blanchard, acted in a highly professional way when dealing with Mr. Uranich. Unfortunately, before the project was completed, Mr. Uranich had filed another law suit against OHM for reportedly damaging some of his material.

Both the fencing and paving subcontractor worked to the OSC's approval and were able to work with Mr. Uranich to his satisfaction. This might have been due to the fact that they were local contractors. UCC even subcontracted Mr. Uranich's business, Yellow Cab and Transfer, to haul asphalt during paving operations.

Notably, UCC was tasked to supply operators and equipment after a severe rain storm, to dig a retention basin for the runoff water. They were able to complete this task in a timely manner.

The fencing contractor was able to complete the fence on schedule without delays even after he was tasked to dismantle and install a 40 foot section of fence to accommodate the grading operations for the asphaltting. Site safety was adhered to by all contractors during the cleanup.